

## **EXHIBIT A**



# OCCUPATIONAL RESOURCE NETWORK

BRIDGING THE GAP . . . . .

June 5, 2006

Attorney Grace V. Bacon Garcia  
Morison Mahoney LLP  
250 Summer Street  
Boston, MA 02210-1181

**RE: Susan Cooney v. Humanistic Psychology Institute et al.**  
**U.S. District Court, Civil Action No. 04 11572JLT**

## VOCATIONAL ASSESSMENT

The file of Ms. Susan Cooney was referred to Occupational Resource Network, Inc., in order to conduct a vocational analysis and render an opinion regarding Ms. Cooney's vocational options and earning capacity based upon her vocational profile as it relates to the labor market. This evaluation was conducted through a review of file records, a transferable skills analysis, vocational research, and vocational expertise in the assessment and placement of adults. The standard vocational resources used to complete this report include, but are not limited to, the following:

*Dictionary of Occupational Titles, U.S. Department of Labor, 4<sup>th</sup> Edition, 1991*  
*The Occupational Information Network (O\*NET), U.S. Department of Labor*  
*Occupational Outlook Handbook, U.S. Department of Labor, 2006-07 Edition*  
*Enhanced Guide for Occupational Exploration, 2<sup>nd</sup> Edition, JIST Works, Inc.*  
*Classification of Jobs, Field & Field*  
*Handbook for Job Analysis, U.S. Department of Labor*  
*Bureau of Labor Statistics, Office of Employment Projections*  
*Bureau of Labor Statistics, Occupational Employment Statistics Survey*  
*MA Division of Career Services and the Division of Unemployment Assistance, Economic Data*  
*Records contained in file (see attached list of Records Reviewed)*

**Brief Profile:** Ms. Susan Cooney is a 50 year old female who resides in Newton Centre, MA. She earned her MSW from Boston University in 1993 and her Ph.D. from Saybrook Graduate & Research Center in 2002. Ms. Cooney was employed as a clinician at Massachusetts General Hospital during the time that she attended Saybrook. She reports that she is unable to obtain her license as a psychologist from the Commonwealth of Massachusetts and, thus, has suffered a loss of earning capacity associated with being a clinical psychologist. Vocational

Cooney, Susan

Vocational Assessment - 2

research reveals that Ms. Cooney has numerous options for employment that utilize her Ph.D. in psychology.

**Educational Background:** Ms. Cooney graduated from Newton North High School in 1973 earning her diploma upon completion of the 11<sup>th</sup> grade. She attended Mt. Ida Junior College for one semester, and then enrolled in Harvard University Extension School. She graduated in 1982 with a Bachelor of Liberal Arts in Extension Studies with a Concentration in Humanities. Ms. Cooney later earned her Master's Degree in Social Work (M.S.W.) from Boston University in 1993. She enrolled in a Certificate of Advanced Graduate Study Program (CAGS) in counseling Psychology at Northeastern University in 1993 but withdrew before completing this program. In 2002, Ms. Cooney earned her Ph.D. in Psychology from Saybrook Graduate School and Research Center.

**Licenses:** Ms. Cooney is a Licensed Clinical Social Worker (License # 2023415) and a Licensed Real Estate Broker (License # 129238).

#### Vocational Profile

**Occupational Background:** Ms. Cooney has been employed in three distinct fields. She has worked as a Master's Level Clinician in Acute Psychiatric Services, has maintained employment as a Real Estate Broker, and has worked in a management capacity. As a Senior Manager, she owned and operated a telephone answering business, which she sold in approximately 1987. She also spent a two year period as Vice President for Cooney Industries where she interacted with senior management staff and coordinated the sale of this company.

Her work history is summarized as follows:

Mass General Hospital	Secretary, Trauma Unit	1989 - 1992
	Clinician	1992 - 2002
Cooney Industries	Vice President	2001 - 2003
Mass Dept of Mental Health	Crisis Team Clinician	1994 - undefined
Waltham Weston Hospital	Communications Manager	1987 - 1989
ABC Business Services	Senior Manager	1980 - 1987
	Owner	
Mt. Auburn Hospital	Lab Coordinator	1978 - 1980

*Date are approximate and job titles are based on Ms. Cooney's resume and deposition transcript.*

**Worker Traits:** The work that Ms. Cooney performed as Clinician fell within the occupational grouping of 10.01.02 Humanitarian: Counseling & Social Work. According to the *Enhanced Guide for Occupational Exploration*, which is based on U.S. Department of Labor information, workers in this group help people deal with their problems. They may work with one person at a time or with groups of people. The work that Ms. Cooney performs as a Real Estate Broker falls within the occupational grouping of 8.02.04 General Sales: Real Estate. Workers in this group sell, demonstrate, and solicit orders for products and services of many kinds. Her business background can be categorized into the grouping of

Cooney, Susan

Vocational Assessment - 3

11.05.02: Business Administration: Administration Specializations. Workers in this group are top level administrators and managers who work through lower level supervisors to direct all of a part of the activities in private establishments or government agencies.

Workers in the aforementioned groups demonstrate the following skills, traits, and characteristics that can be transferred to other jobs:

- Use logical thinking and special training to counsel others or to help a person define and solve personal problems.
- Care about people, their needs, and their welfare enough to want to help in some way.
- Understand the way government programs and social service organizations function.
- Gain the trust and confidence of people.
- Understand and explain company policies.
- Treat customers with courtesy and respect, even in difficult situations
- Talk easily and persuasively to other people, using language that they'll understand.
- Help customers to make up their minds about purchases by suggesting appropriate products.
- Think logically to make decisions
- Interpret information in mathematical, written, and diagram form.
- Understand the effect politics and economic trends will have on company or agency plans.
- Continually make decisions based on experience and personal feelings as well as on facts and figures.
- Speak and write clearly and with authority.

**Aptitudes:** As per the U.S. Department of Labor, aptitudes are defined as the specific capacities or abilities required of an individual in order to facilitate the learning of some task or job duty. According to the *Enhanced Guide for Occupational Exploration*, via her work history, Ms. Cooney has demonstrated the following aptitudes that can be transferred to various employment settings:

**General Intelligence:** General learning ability

**Verbal Reasoning:** Ability to understand the meaning of words and ideas associated with them and to use them effectively. To present information or ideas clearly.

**Numerical Reasoning:** Understanding numbers and doing arithmetic quickly and accurately.

**Clerical Perception:** Ability to perceive pertinent details in verbal or tabular manner. To observe differences in copy, to proofread words and numbers and to avoid perceptual errors in arithmetic computation.

**Spatial Aptitude:** Ability to comprehend forms in space and understand relationships of plane and solid objects; frequently described as the ability to visualize objects of two or three dimensions or to think visually of geometric forms.

**Form Perception:** The ability to perceive pertinent details in objects or graphic material. To make visual comparisons and discriminations and see slight differences in shapes and shadings of figures and widths and lengths of lines.

Cooney, Susan

Vocational Assessment - 4

**Vocational Analysis:** Ms. Cooney is a 50 year old woman who resides in Newton Centre and is presently working as a real estate broker and housepainter. Her vocational profile is significant for a high academic achievement level and a strong work history within the counseling field as well as in business environments. This combination, along with her Ph.D. in psychology, provides her with unique vocational assets for work in a range of occupational areas.

Ms. Cooney's Master's in Social Work (MSW), Social Work License, and work experience enable her to perform clinical work in the full spectrum of this field. Positions that would make use of her present clinical skills include: Child & Family Therapist, Trauma Therapist, Forensic Counselor, Substance Abuse Counselor, Social Worker, and Clinician. As per the Bureau of Labor Statistics, wage ranges for "Medical & Public Health Social Workers" are \$26,130 - \$60,880. The acquisition of a Ph.D. enhances her level of knowledge in this field and creates a more desirable candidate, with the ability to earn incomes noted in the high end of the salary ranges for this field. By adding the Ph.D. level of education she would also qualify, in the clinical field, for management and supervisory positions within her area of expertise such as Program Coordinator, Program Supervisor, and Program Manager. Qualifications for such positions include a Ph.D. as well as a clinical license, which Ms. Cooney possesses in the form of her LCSW. The Ph.D. designation further allows Ms. Cooney to specialize in a particular area.

According to the *Occupational Outlook Handbook*, psychologists in independent practice or those who offer any type of patient care, including clinical, counseling, and school psychologists, must meet certification or licensing requirements. As per the Bureau of Labor Statistics, wage ranges for "Clinical Psychologists" are from \$34,040 - \$99,270. However, without such a license, Ms. Cooney's Ph.D. in and of itself creates the pathway for numerous career opportunities. For example, teaching, research, management, and consulting work can be performed as a result of earning a Ph.D. in psychology. Teaching in a university setting requires a Ph.D. and the ability to perform academic research. Research alone, however, can also be performed at government agencies or for private research organizations. As a graduate of a Ph.D. program, Ms. Cooney has formal training in research procedures. This training makes her a strong candidate for employment in survey research, healthcare, and government settings where the ability to apply statistical knowledge to practical problems is required. Similarly, management and consulting jobs are found throughout the private sector. As per the Bureau of Labor Statistics, wage ranges for "Psychologists, all other" are \$33,150 - \$111,620. It is noteworthy when considering specialties within the field of psychology that "Management & Technical Consulting Services" are among the top paying industries for psychology professionals with annual mean wages of \$134,760 versus an annual mean wage of \$54,140 for those engaged in individual and family services and \$81,560 for those working in offices of health care practitioners.

**Conclusion:** Based upon a review of the records, a transferable skills analysis, vocational research, and over twenty years of providing vocational services, it is my vocational opinion that Ms. Cooney is currently employable, with significant earning potential, in positions that

Cooney, Susan

Vocational Assessment - 5

utilize her Ph.D. in Psychology as well as her existing skills. This opinion is based upon a vocational analysis taking into consideration Ms. Cooney's age, education, vocational profile, and transferable skills. Information about transferable skills comes from one or more of the following industry accepted documents listed above. Labor market information is obtained through vocational research as well as statistical information from the Department of Labor.

I reserve the right to amend this report and provide additional rebuttal should new information become available.

Sincerely,

  
Nancy L. Segrove, MA, CRG  
Vocational Rehabilitation Consultant

Cooney, Susan

Vocational Assessment - 6

**Records Reviewed in Conducting Vocational Assessment**

1. Amended Civil Complaint and Demand for Jury Trial;
  2. Defendants' Amended Answer to Plaintiff's Amended Complaint and Jury Demand;
  3. Saybrook Institute Interim Catalog 1994-1995;
  4. Deposition of Susan Cooney taken on 1/26/06,
  5. Deposition of Susan Cooney taken on 1/27/06;
  6. Deposition Exhibits 1-28;
  7. Records produced by Dr. David Reisen;
  8. Saybrook's Production of Documents bates stamped S01784 – S01804; S01809 – S01925; S01966 – S01967; S02042 – S02045; S02071 – S02084;
- and,
9. Deposition of Dennis K. Norman taken on 5/2/06.